

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

**TYLER DIVISION**

**STRAGENT, LLC,**

*Plaintiff,*

**v.**

**STMICROELECTRONICS, INC., et al.,**

*Defendants.*

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**CIVIL ACTION NO. 6:11-CV-111-LED**

**JURY TRIAL DEMANDED**

**PLAINTIFF STRAGENT, LLC'S ANSWER TO DEFENDANT  
ROBERT BOSCH LLC'S COUNTERCLAIMS**

Stragent, LLC ("Stragent"), plaintiff in the above-captioned civil action, responds to each of the numbered paragraphs of the Counterclaims of Defendant Robert Bosch LLC ("Bosch"), as set forth in Robert Bosch LLC's Answer and Counterclaims to Plaintiff Stragent, LLC's First Amended Complaint for Patent Infringement (Dkt. No. 191), as follows:

**NATURE OF THE ACTION**

1. Stragent admits that Bosch purports to counterclaim for a declaratory judgment of non-infringement and invalidity under the Declaratory Judgment Act, 28 U.S.C. § 2201, et seq. Stragent denies any remaining allegations set forth in paragraph 1 and specifically denies that Bosch is entitled to such a declaratory judgment.

**THE PARTIES**

2. Stragent admits the allegations set forth in paragraph 2.
3. Stragent admits the allegations set forth in paragraph 3.

**JURISDICTION AND VENUE**

4. Stragent admits the allegations set forth in paragraph 4.

5. Stragent admits the allegations set forth in paragraph 5.

**COUNT 1**

**Declaratory Judgment of Non-Infringement of the '263 Patent**

6. Stragent restates and incorporates by reference its answers to Paragraphs 1-5 above, but Stragent denies the allegations in those paragraphs unless specifically admitted therein.

7. Stragent admits the allegations set forth in paragraph 7.

8. Stragent admits that its charges of infringement in the Complaint and First Amended Complaint, and Bosch's purported denials of those charges, have created an actual and justiciable controversy between Bosch and Stragent concerning the '263 patent. Stragent denies any remaining allegations set forth in paragraph 8.

9. Stragent denies the allegations set forth in paragraph 9.

10. Stragent denies the allegations set forth in paragraph 10.

**COUNT 2**

**Declaratory Judgment of Invalidity of the '263 Patent**

11. Stragent restates and incorporates by reference its answers to Paragraphs 1-5 and 7-8 above, but Stragent denies the allegations in those paragraphs unless specifically admitted therein.

12. Stragent denies the allegations set forth in paragraph 12.

13. Stragent denies the allegations set forth in paragraph 13.

**BOSCH'S PRAYER FOR RELIEF**

Stragent denies that Bosch is entitled to any relief and specifically denies all the allegations and prayers for relief contained in paragraphs A-E of Bosch's Prayer for Relief.

**PRAYER FOR RELIEF**

WHEREFORE, Stragent respectfully requests that this Court enter judgment denying and dismissing Bosch's counterclaims, and that the Court enter judgment in favor of Stragent as requested in Stragent's First Amended Complaint for Patent Infringement (Dkt. No. 124), as amended or supplemented.

**DEMAND FOR JURY TRIAL**

Stragent, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric M. Albritton", written over a horizontal line.

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 11th day of November 2011.

A handwritten signature in black ink, appearing to read "Eric M. Albritton", written over a horizontal line.

Eric M. Albritton